

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND, SOUTHERN DIVISION

NICOLE M. BRUNO

Plaintiff	:	
	:	
vs.	:	Case: AMDo3CV358
	:	
DONALD ENSTE, et al.	:	
	:	
Defendants	:	
	:	

MOTION TO EXTEND DISCOVERY

Defendant, Donald Enste by his attorney, Andrew B. Greenspan, hereby files this motion to extend the time to complete discovery, and for reasons states as follows:

1. The parties are making a good faith effort to cooperate and complete necessary discovery in this matter. However, due to scheduling conflicts and unforeseen delays in obtaining discovery responses, they will be unable to complete discovery within the time set forth in the Scheduling Order.
2. Both parties consent to a 60 day extension of time in which to complete discovery along with an extension of time for 30 days after the close of discovery for the filing of dispositive motions.
3. Counsel for plaintiff, Nicole Bruno consents to the extension of time as set forth in this motion.

WHEREFORE, for the reasons set forth herein, the parties request that the Scheduling Order in this matter be amended to extend the time to complete discovery to November 3, 2003.

ANDREW B. GREENSPAN
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Attorney for Defendant

DANNY R. SEIDMAN
8 Post Office Road
Waldorf, Maryland 20602-2709
(301) 870-9997

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29th day of August, 2003, a copy of the foregoing Motion to Extend Discovery was mailed, postage prepaid, to **Danny R. Seidman, Esquire.**, 80 Post Office Road, Waldorf, Maryland 20602-2709.

ANDREW B. GREENSPAN

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	:	
Defendants	:	
	:	

ORDER

Upon consideration of the Motion to Extend Time to Complete Discovery and no opposition thereto, it is this _____ day of _____, 2003, by the United States District Court for the District of Maryland,

ORDERED that the motion is hereby GRANTED and discovery is extended to November 3, 2003; and it is further

ORDERED that the time for filing dispositive motions is extended to December 3, 2003.

JUDGE, U.S. Dist. Ct. for the Dist. of Md.

Copies to:

ANDREW B. GREENSPAN, ESQ.
DANNY R. SEIDMAN, ESQ.